

Progress Report – US v Farias-Cardenas et al, 2-19-cr-00111

November 19, 2019

This progress report will contain information related to what discovery we've received, when we've received it, what type(s) we've received, and how much we've been able to organize.

The Following is a General Summary of Discovery:

Behind the Gavel was given discovery via encrypted discs and hard drives. It is our practice to begin discovery organization as soon as our budget has been formally approved by the supervising Circuit. We were informed that our budget was approved on August 01, 2019.

We have received 7 discovery disclosures to date:

August 21, 2019 Disclosure 1: 349 MB of total data

Received Through: encrypted hard drive

Raw Data: 151 files, 3,394 pages

Includes: Pleadings

September 5, 2019 Disclosure 2: 823 MB of total data

Received Through: disc

Raw Data: 1,067 files, 4,431 pages, 16:24:58 audio material

Includes: Wiretap Data

September 20, 2019 Disclosure 3: 1,192 MB of total data

Received Through: encrypted hard drive

Raw Data: 4,393 files, 2,616 pages

Includes: Subscriber Tolls, GPS pings and reports

September 20, 2019 Disclosure 4: 31 GB of total data

Received Through: encrypted hard drive

Raw Data: 613 files, 3,777 pages, 35:33:38 audio/video material

Includes: ATF exhibits

September 23, 2019 Disclosure 5: 4.5 GB of total data (not including Pole Cam footage)

Received Through: encrypted hard drive

Raw Data: 348 files, 25,636 pages

Includes: Phone downloads and reports

October 10, 2019 Disclosure 6: 4.4 GB of total data

Received Through: encrypted hard drive

Raw Data: 1,247 files, 9,711 pages, 9:16:45 audio/video material

Includes: Audio/video recordings, more Wiretap data, and more reports

November 7, 2019 Disclosure 7: 6.3 GB of total data

Received Through: encrypted hard drive

Raw Data: 460 files, 2,828 pages, 4:39:43 audio/video material

Includes: A/V recordings, agency reports, pleadings, search warrant photos and lab reports

The Following is a General Summary of Organized Discovery:

To date, we have OCR'd all discovery pages. We have imported 2,564 documents containing approximately 107,543 pages to our organizational database. We will utilize this database to produce organized Phase 1 discovery. We will continuously update these numbers to accurately reflect our progress.

We have identified the following relevant case entities within those 107,543 discovery pages:

72	Person	92	Phone Numbers
2,564	Document	41	Vehicles
56	Place	193	Other (<i>firearms, phones, etc</i>)
510	Exhibit	473	Events
4,352	Wiretaps		

We have identified the following discovery types within those discovery pages:

3	Advice of Rights
250	Agency Reports
41	Audio
2	Business Records
9	Cell Phone Records
2	Consent to Search
41	Criminal History
4	Curriculum Vitae
4	E-mail
1	Employment Records
145	Evidence/Property Receipt
3	Facebook
24	Financial Records
5	Firearms Tracy Summary
61	Forensic Reports
7	GPS Data
2	Indictment
17	Information
13	Jpay Letter
84	Laboratory Reports

2	Letter
379	Photos
353	Placeholders
411	Pleadings
22	Property Records
3	Prosecution Recommendation
8	Public Utility Records
4	Redacted Document
2	Sketch
2	Snapchat
3	Statement
1	Subpoena Return
1	Summary
3	Title III
552	Transcript
56	Vehicle Information
44	Video

The Following is a Summary of Productions provided by Behind the Gavel to Defense Counsel:

September 30, 2019 Production #1:

We completed an initial discovery inventory and full text search index copied to the first USB drive, along with all processed discovery received and an organized Wiretap Hub. Drives were either personally delivered by BTG or picked up by counsel.

Number of Production #1 Drives delivered/picked up by Counsel: 17/17

November 19, 2019 Production #2:

Production #2 includes the processed Disclosures 1 - 6, organized via the Discovery Hub. Organized Wiretap data, GPS Pings and Toll data is also included. Counsel was notified via email on 11/18/19 that upon return of Production 1 drives, Production 2 can be provided to them on those same drives.

Additionally, De Novo will be updated with all 7 disclosures on or before 11/25/19.